

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	<b>18-04107-01-CR-C-RK</b>
	)	
JASON WILLIAM SIESSER,	)	
	)	
Defendant.	)	

**DEFENDANT'S SENTENCING MEMORANDUM**

COMES NOW Defendant Jason Siesser, by and through his attorney, and submits this sentencing memorandum. The purpose of this memorandum is to provide background information about Mr. Siesser and the case that is not included in the Presentence Investigation Report or the government's memorandum. The parties have agreed to a joint recommendation as follows:

Count 1: 84 months imprisonment;  
Count 2: 60 months imprisonment;  
Total: 144 months imprisonment.

This complex case has been litigated for several years, including substantial pre-filing discussions between the defense and the government. Each side devoted substantial time to the case before reaching the joint sentencing agreement. Mr. Siesser requests that the Court accept the joint recommendation and impose a sentence of 144 months imprisonment.

**I. Background**

Mr. Siesser profoundly regrets the harm that he has caused to D.W. and his own family. He has experienced years of depression though he understands that his difficulties do not excuse

his actions. He will seek out every opportunity in the Federal Bureau of Prisons to address his mental health needs to assure that he can return to a productive life. Jason's family and friends describe a different Jason Siesser than the police reports describe (find attached support letters). Jason has the intelligence and drive to address his problems, use the support around him, and eventually show that his crime will not define his entire life.

### **The Guidelines Calculations**

The defense did not raise objections to the Presentence Investigation Report's guidelines calculations.

## **II. Sentencing Factors**

The Sentencing Guidelines are the starting point for the Court to analyze an appropriate sentence but all the factors of 18 U.S.C. §3553(a) should be considered:

- a.) **§3553(a)(2)(a) Promoting Respect for the Law.** The recommended sentence is substantial and promotes respect for the law.
- b.) **§3553(a)(1) The Nature and Circumstances of the Offense.** The agreed to sentence reflects the seriousness of the offense.
- c.) **§3553(a)(1) History and Characteristics of Defendant.** Mr. Siesser has no criminal history, an advanced education, and good work history.
- d.) **§3553(a)(2)(c) Need To Protect The Community From Further Crimes.** The recommended sentence is substantial and satisfies this sentencing goal.
- e.) **§3553(a)(2)(b) The Need To Afford Adequate Deterrence To Criminal Conduct.**  
The recommended sentence is substantial and satisfies this sentencing goal.

## V. Conclusion

Jason is aware that this case represents a significant failure on his part, and he has accepted responsibility for his actions and stands before the Court respectfully requesting that the Court follow the joint recommendation.

Respectfully submitted,

Holder | Susan | Slusher

*s/Christopher A. Slusher*

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*Attorney for Defendant*

## CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2021, the foregoing was filed electronically with the Clerk of Court using CM/ECF system for electronic delivery to all counsel of record.

*s/ Christopher A. Slusher*

Christopher A. Slusher, #39321

Attorney for Defendant